

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RALPH M. WATSON, an individual,

Plaintiff,

-against-

NY DOE 2, an individual; ILLINOIS DOE 1, an individual; DOE COMPANY, an unknown business entity; and DOES 2 through 100, whose true names and capacities are unknown,

Defendants.

Case No. 1:19-cv-533-JGK-DCF

**DECLARATION OF MICHAEL W. AYOTTE IN SUPPORT OF  
HIS MOTION TO DISMISS DEFENDANT AND COUNTERCLAIMANT  
NY DOE 2'S COUNTERCLAIM**

I, Michael W. Ayotte, hereby declare, pursuant to 28 U.S.C. § 1746 and Local Civil Rule 1.9 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, that the following is true and correct:

1. I am an attorney with the law firm of Law Offices of Michael W. Ayotte, counsel for Plaintiff Ralph M. Watson. I am admitted pro hac vice to practice on this case before this Court. I submit this declaration in support of Watson's motion to dismiss NY Doe 2's anti-SLAPP counterclaim. The statements made in this declaration are based on my personal knowledge, on information provided to me by Plaintiff, or on materials contained in the files maintained by myself in this matter. If called upon to testify as a witness, I would testify as to the following:

2. Discovery has revealed that the sole accuser of Watson is NY Doe 2, who first complained to DMA about sexual harassment by men other than Watson on December 29, 2017. She did not complain about Watson until January 13, 2018 and DMA did nothing to corroborate

her allegations; instead, posting them in real time on its Instagram account.

3. Submitted herein as **Exhibit A** is a true and correct copy of NY Doe 2's statement setting forth her allegations against Watson, drafted with the assistance of her attorneys at the request of CP+B, in response to Watson's lawsuit against his former employer in or around October of 2018. (Watson 197-201). This statement was provided to me by CP+B's attorneys on or around October 22, 2018.

4. Submitted herein as **Exhibit B** is a true and correct copy of the relevant portions of Plaintiff Ralph M. Watson's deposition transcript from his May 17, 2021 deposition in this action.

5. Submitted herein as **Exhibit C** is a true and correct copy of the Declaration of Anonymous Nonparty Witness 1, dated April 15, 2020 that was introduced as Exhibit 3 of NY Doe 2's Deposition.

6. Submitted herein as **Exhibit D** is a true and correct copy of the relevant portions of Anonymous Nonparty Witness 1's deposition transcript from her July 16, 2021 deposition in this action.

7. Submitted herein as **Exhibit E** is a true and correct copy of the January 25, 2018 notes from CP+B's interview of NY Doe 2 after the DMA attacks on Watson that were produced by Watson in discovery (Watson 208-210).

8. Submitted herein as **Exhibit F** is a true and correct copy of the relevant portions of NY Doe 2's deposition transcript from her May 16, 2021 deposition in this action.

9. Submitted herein as **Exhibit G** is a true and correct copy of the April 8, 2017 "I LOVE NY" post on her Instagram account (Watson 614).

10. Submitted herein as **Exhibit H** is a true and correct copy of the relevant text messages between Plaintiff and NY Doe 2 (Watson 553-565).

11. Submitted herein as **Exhibit I** is a true and correct copy of the relevant text messages between Watson, NY Doe 2 and others, where NY Doe 2 invited Watson and the others to brunch (Watson 594-595).

Dated: Rancho Palos Verdes, CA  
November 19, 2021

By: /s/ Michael W. Ayotte

---

*Michael W. Ayotte*

LAW OFFICES OF MICHAEL W. AYOTTE  
2629 Manhattan Ave., Suite 144  
Hermosa Beach, CA 90254  
Telephone: (310) 343-1864  
mayotte@clientfirstlegalsolutions.com

Counsel for Plaintiff and Counterclaim Defendant  
RALPH M. WATSON